Last Minute Memorandum

To: **STATE BOARD MEMBERS** **Date:** **July 9, 2003**

From: **Sue Stickel, Deputy Superintendent, Curriculum and Instruction Branch**

Re: **ITEM 14**

Subject **NO CHILD LEFT BEHIND (NCLB) TITLE III ACHIEVEMENT OBJECTIVES AND ACCOUNTABILITY REQUIREMENTS**

Please replace the existing Attachment 2 with the Revised Attachment 2.

Attachment 2:

Issue Paper –AMAO 2
Issues related to the Establishment of the Second AMAO for Title III (Pages 1-10)

Minor revisions have been made, to pages 2-4, to more clearly reflect the students included in Options A through D and the disadvantages of each option.

The revisions are in bold text and underlined. Revisions have been made on the following pages.

Page 2, Option A. Disadvantages – added second bullet.
Page 2, Option B. added footnote 2.
Page 3, Option B. Disadvantages – added second bullet.
Page 3, Option C. added footnote 3.
Page 3, Option C. Disadvantages – added first bullet.
Page 4, Added 2 paragraphs.

Issue Paper - AMAO 2
Issues Related to the Establishment of the Second AMAO for Title III

This is the second issue paper that identifies issues that must be resolved in order to meet the requirements of Title III of No Child Left Behind (NCLB). The SBE's task is to define two annual measurable achievement objectives (AMAOs) for limited-English-proficient students (§ 3122).
The two AMAOs that need to be defined are:

1. Gains in the percentage of students meeting annual California English Language Development Test (CELDT) objectives.
2. Annual increases in the percentage of students attaining English language proficiency as demonstrated by the CELDT.

Unlike AMAO 1 which focused on annual gains for all students, AMAO 2 focuses on what percentage of students attain English language proficiency. This AMAO is based on a cohort analysis. Section 3122 specifies that such AMAOs shall be developed in a manner that reflects the amount of time an individual child has been enrolled in a language instruction educational program. In May, the SBE adopted the definition of English language proficiency that will be used in AMAO 2 as Early Advanced Overall, with all skill area scores at the Intermediate level or above.

There are three major decisions that need to be made in order to establish annual targets for the second AMAO.

1. Determine which students are appropriate to include in the analysis.
2. Set the initial target for 2003-04.
3. Set the targets for 2004-05 to 2013-14.

Step 1. Determine which students are appropriate to include in the analysis

Given the need to conduct a cohort analysis, one key issue to address is *which students can reasonably be expected to reach English language proficiency at a given point in time*. This is optimally determined using longitudinal data, in order to propose targets for students based on their English language proficiency levels when they enter California schools, and their corresponding attainment of the English proficient level over time. There are two problems with the current data. The first problem is that there are only two years of CELDT data on English learners. The second problem is that while data on the number of years students have been in U.S. public schools are available, there are a large number of missing cases. Information on years in U.S. schools was available for only 49 percent of the students taking the CELDT 2002 Annual test. Moreover, response options on the CELDT header sheet range from "less than one school year" to "five school years." Since there is no response option for years of U.S. schooling beyond five years, it is unclear if those who had more than five years marked "five school years" or left the variable blank. It is expected that the response rate and accuracy on the years in U.S. schools variable will increase over time as school personnel become accustomed to collecting it.

In addition to years in U.S. schools another key factor to consider in determining which students to include for analysis is students' prior CELDT level since this may also indicate which students can reasonably be expected to reach English language proficiency.

Four options for determining which students to include in the analysis are described along with the advantages and disadvantages of each option. Note that students' time in U.S. schools is obtained from the last CELDT administration (2002 for this analysis), while CELDT level refers to their performance prior to the latest CELDT administration (2001 for this analysis).

Option A. Include students who have been in U.S. schools for 4 or more years

This option includes for analysis those students with four or more years in US schools based on 2002 Annual CELDT data. Setting a 4-year criterion is defensible based on the annual objective that students progress one proficiency level per year on the CELDT.

Advantages

- considers students' expected performance in relation to time in U.S. schools
- consistent with annual objective that students progress one proficiency level per year on the CELDT
- existing empirical studies of time to language proficiency, which estimate 3 to 5 years for oral fluency, and 4 to 7 years for overall English language proficiency also support a 4 year criterion.[1]

Disadvantages

- does not count those students who reach English proficiency in less than 4 years
- **credits LEAs for students previously reaching English proficiency who maintain the proficient level, since prior CELDT level is not considered. This could provide a disincentive to reclassify students.**
- given the large percentage of students missing "years in U.S. school" values this option may significantly limit the number of students considered on an annual basis

Option B. Include the following students[2]:

1. students who have been in U.S. schools for 4 or more years
2. students at the Intermediate level or above who did not previously reach English proficiency

In addition to time in U.S. schools, this option considers students' prior language proficiency level by including students at the Intermediate level of proficiency or above in 2001. Option B excludes those students who previously attained English language proficiency.
Advantages--Includes all of the advantages of Option A plus:

[1] See, for example, De Avila, E. (1997*). Setting expected gains for non and Limited English Proficient students*. Washington D.C.: National Clearinghouse for English Language Acquisition, and Hakuta, K., Butler, Y., & Witt, D. (2000). *How long does it take English learners to attain proficiency?* Santa Barbara: University of California Linguistic Minority Research Institute Policy Report 2000-1.

[2] This analysis is based on the set of students with two years of CELDT scores.

- includes students at the Intermediate level because they could reasonably be expected to reach English proficiency
- may motivate LEAs to better attend to the many English learners statewide that have plateaued at the Intermediate level
- increases the number of students included in the analysis relative to Option A

Disadvantages

- does not credit LEAs who have students who are at levels lower than Intermediate who reach English proficiency
- **only includes students with 2 years of CELDT scores**

Option C. Include the following students[3]***:***

1. students who have been in U.S. schools for 4 or more years
2. students at the Intermediate level or above who did not previously reach English proficiency
3. students below Intermediate who meet the English proficient level

Option C is similar to Option B but it credits LEAs for all students who reach the English proficient level even if they were below the Intermediate level. It does not penalize districts for students below the Intermediate level who do not reach the English proficient level.

Advantages--Includes all of the advantages of Options A and B and, in addition,

- credits LEAs for those students below Intermediate who meet the proficient level

Disadvantages

- **only includes students with 2 years of CELDT scores**

Option D. Include the following students:

1. students who have been in U.S. schools for 4 or more years
2. students who reach English proficiency regardless of time in U.S. schools or prior CELDT level

Option D combines elements of Option A and Option C. It includes for analysis those students with four or more years in US schools based on 2002 Annual CELDT data, and it credits LEAs for all students who reach the English proficient level regardless of time in U.S. schools or prior CELDT level.

Advantages--Includes all of the advantages of Option A plus:

- mitigates the disadvantages described in Options A and B by including all those students reaching English proficiency regardless of time in U.S. schools or prior CELDT level
- increases the number of students and LEAs included in the analysis relative to all other Options

[3] This analysis is based on the set of students with two years of CELDT scores.

Disadvantages

- given the large percentage of students missing "years in U.S. school" values, this option may exclude a significant number of students
- credits LEAs for students previously reaching English proficiency who maintain the proficient level, since prior CELDT level is not considered. This could provide a disincentive to reclassify students.
- could set artificially high initial target, if students reaching English proficiency in future years are more carefully monitored for reclassification and less likely to retake CELDT

Table 1 shows the number of CELDT test takers and LEAs that are included for analysis given the inclusion criteria used in each option and currently available CELDT data. A key factor in determining how many students and LEAs are included is the percent of students missing data on two key variables collected as part of CELDT testing:

- **the number of years in U.S. schools (provided for 49 percent of 2002 students)**
- **prior year CELDT scores (provided for 66 percent of 2002 students)**

The response rate on both of these variables needs to be improved in order to accurately compute the percentages of students meeting the AMAOs in each LEA. As collection of these two data elements improves over time, the target structures may need to be re-examined to ensure that the targets are appropriate when applied to a more complete data set.

Table 1
Number of Students and LEAs Included in the Analysis
Under Four Different Options

Option	Total Students / LEAs Included	Percent of 2002 Annual CELDT takers/LEAs
A	304,040 547	23.5% 78.7%
B	448,055 516	34.6 74.2
C	475,060 522	36.7 75.1
D	579,342 614	44.7 88.3

2002 Annual CELDT Student N = 1,295,171.
Number of LEAs with 25 or more CELDT takers = 695.

Recommendation: Adopt Option C which includes the following students in the analysis:

1. ***students who have been in U.S. schools for 4 or more years***
2. ***students at the Intermediate level or above who did not previously reach English proficiency***
3. ***students below Intermediate who meet the English proficient level***

Step 2. Set starting point for 2003-04

As was done with the first AMAO, we recommend using a process similar to Title I's Adequate Yearly Progress requirements for determining the starting point. In that method, schools are ranked and the starting point is set at the percentage of students who meet the target in the school at the 20th percentile of the State's total enrollment. For Title III, only LEP students with CELDT data are used and LEAs are used instead of schools because LEAs are held accountable.

The target will be defined as the percent of LEP students in an LEA who achieve English language proficiency. In May, the SBE adopted the definition of English language proficiency as Early Advanced Overall, with all skill area scores at the Intermediate level or above.

Recommendation: Use the Title I method of determining the starting point for 2003-04.

Step 3. Set the targets for 2004-05 through 2013-14.

Three options for target structures are outlined that parallel the target structures for AMAO 1[4]. The target structures all use the 20th percentile of the State's LEP student enrollment with CELDT data as the starting point and vary in where they expect the end point to be in 2013-14. Three end points were chosen as options. As was done in AMAO 1:

- option 1 ends at the 60th percentile of the LEA distribution. That is the level where 60 percent of LEAs are below the target and 40 percent are above.
- option 2 ends at the 75th percentile of the LEA distribution.
- option 3 ends at the 90th percentile of the LEA distribution.

The target structures are parallel to AMAO 1 where all three options have smaller gains the first three years. The targets increase 1/3 of a step the first three years and then 1 step per year until 2013-14.

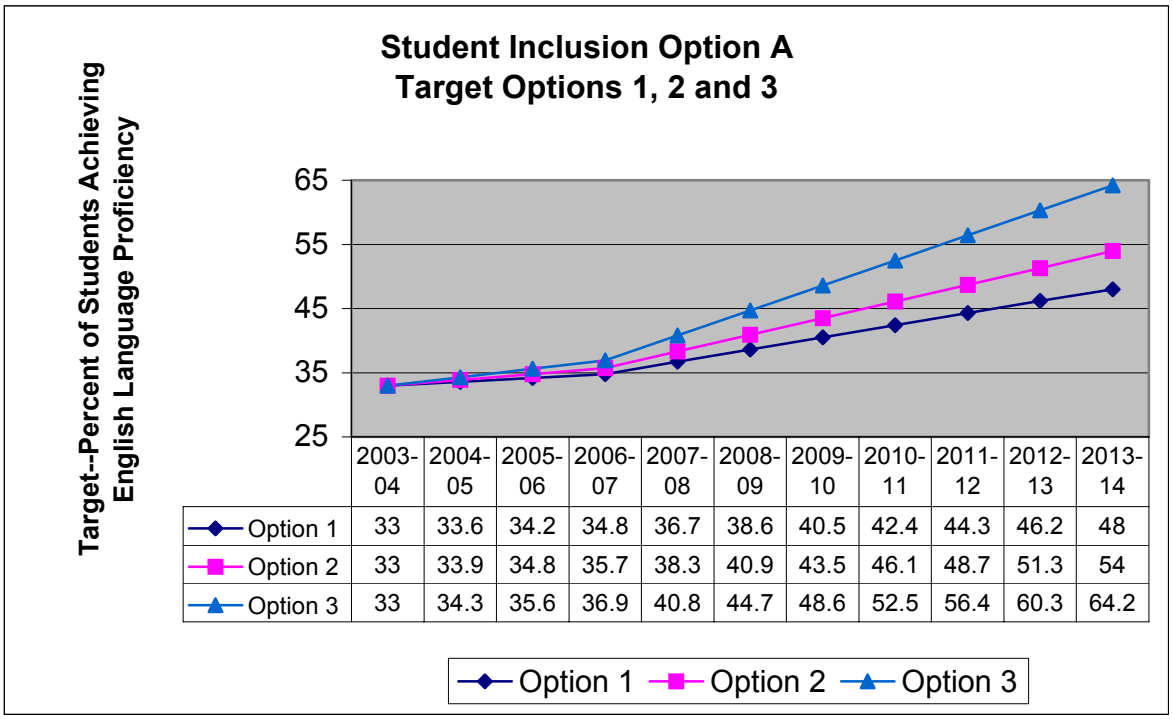
Pages 6 through 9 contain charts outlining 1) the target structure and 2) the percent of LEAs meeting the targets for each of the options for student inclusion (Options A through D) that were outlined in step 1. Once the student inclusion criteria have been determined, a decision will need to be made regarding which target option to use.

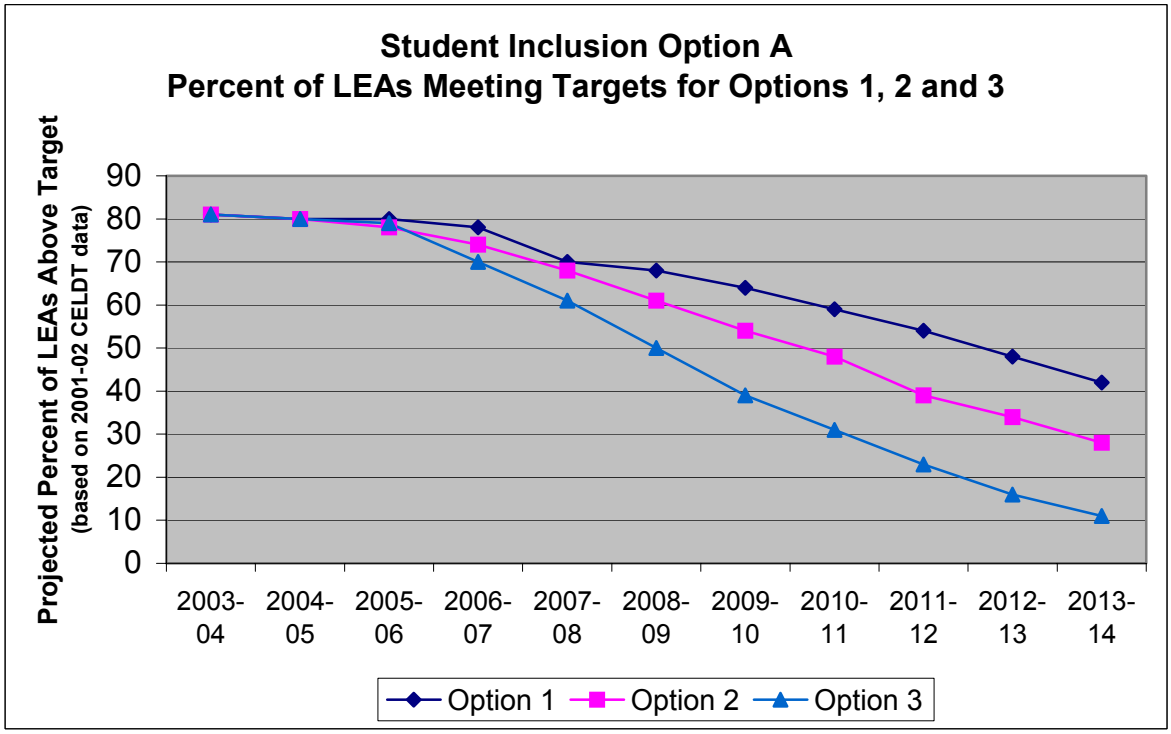
[4] As with AMAO 1, the data presented here are based on LEAs with 25 or more students with CELDT data. These results are more stable than those that include very small LEAs and should be used to establish targets even if a smaller minimum size is used for accountability purposes.

Option 2 is consistent with the recommendation for the first AMAO and would require districts to be at the level that the upper 25 percent of LEAs are now. This would be a rigorous target but is achievable if LEAs provide more focused and effective instruction targeted to the needs of their English learners.

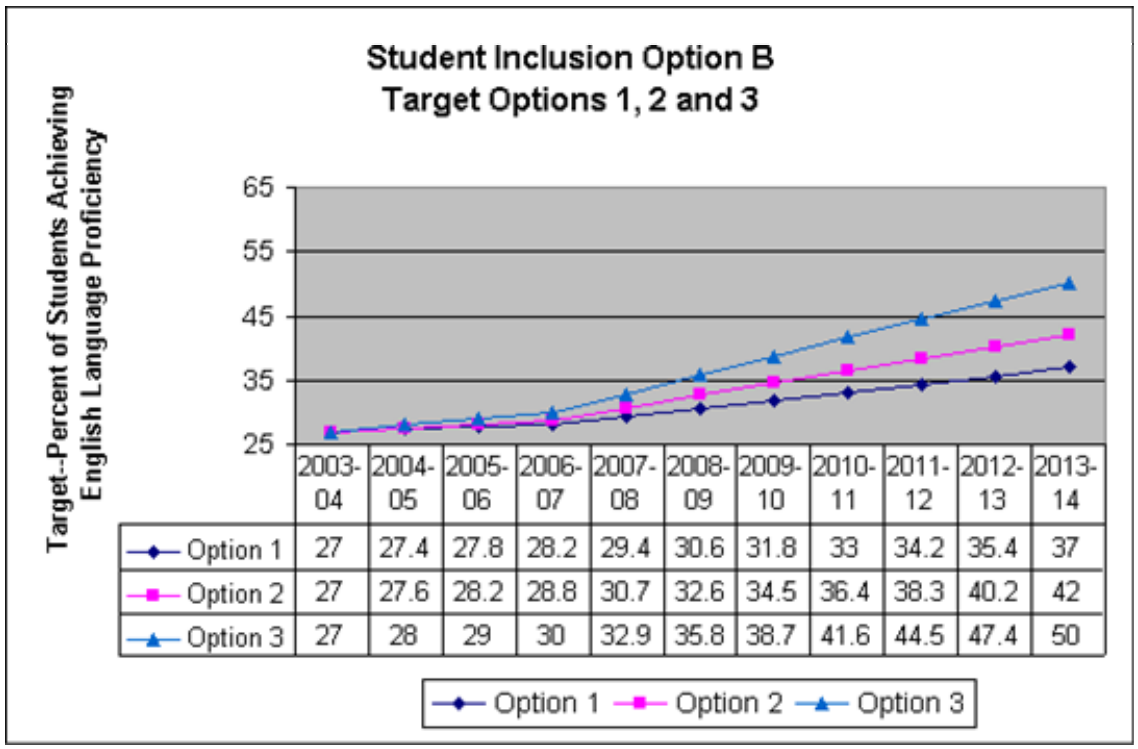
Recommendation: Select Option 2 which ends at the 75th percentile of the current LEA distribution

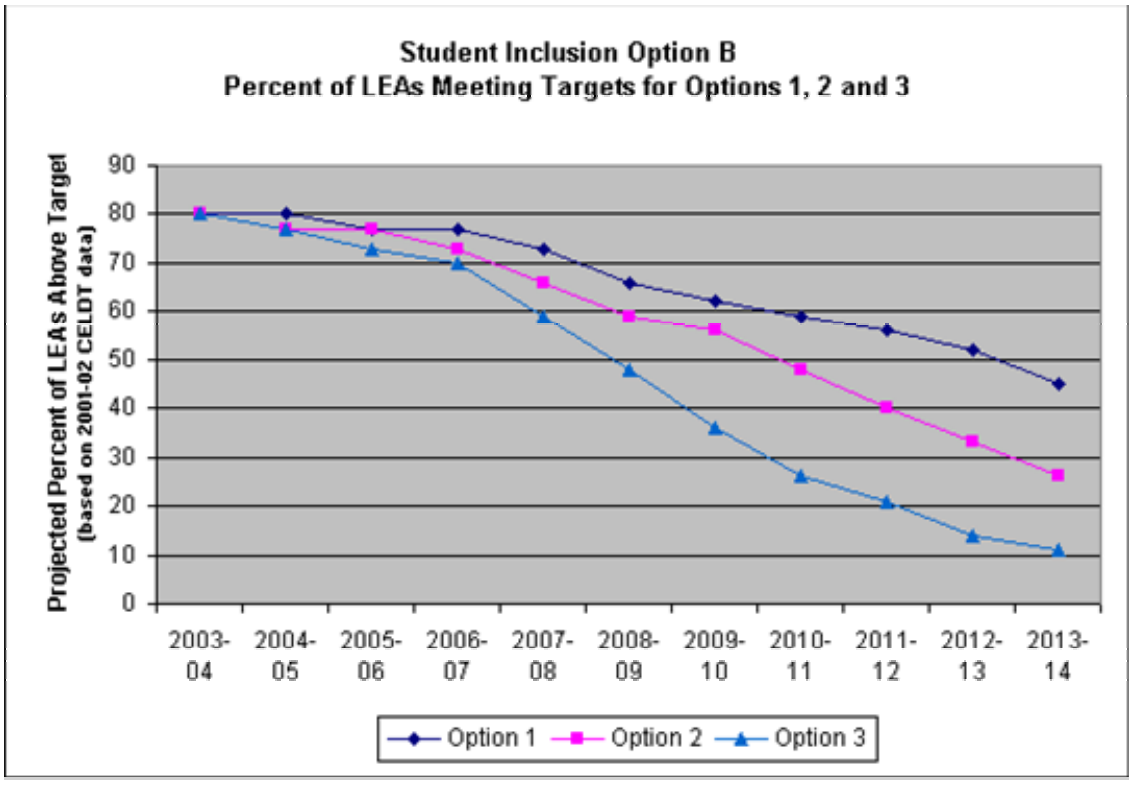
Student Inclusion Option A
Target Options and the Percent of LEAs Meeting Targets



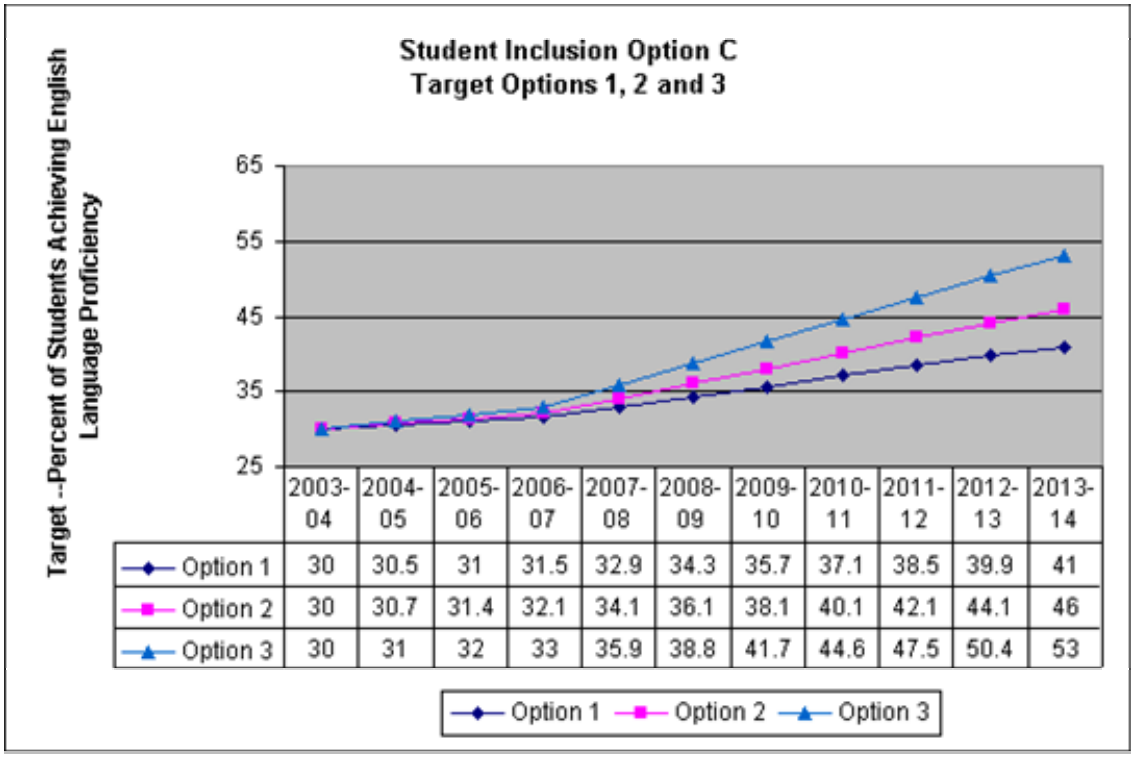


Student Inclusion Option B
Target Options and the Percent of LEAs Meeting Targets

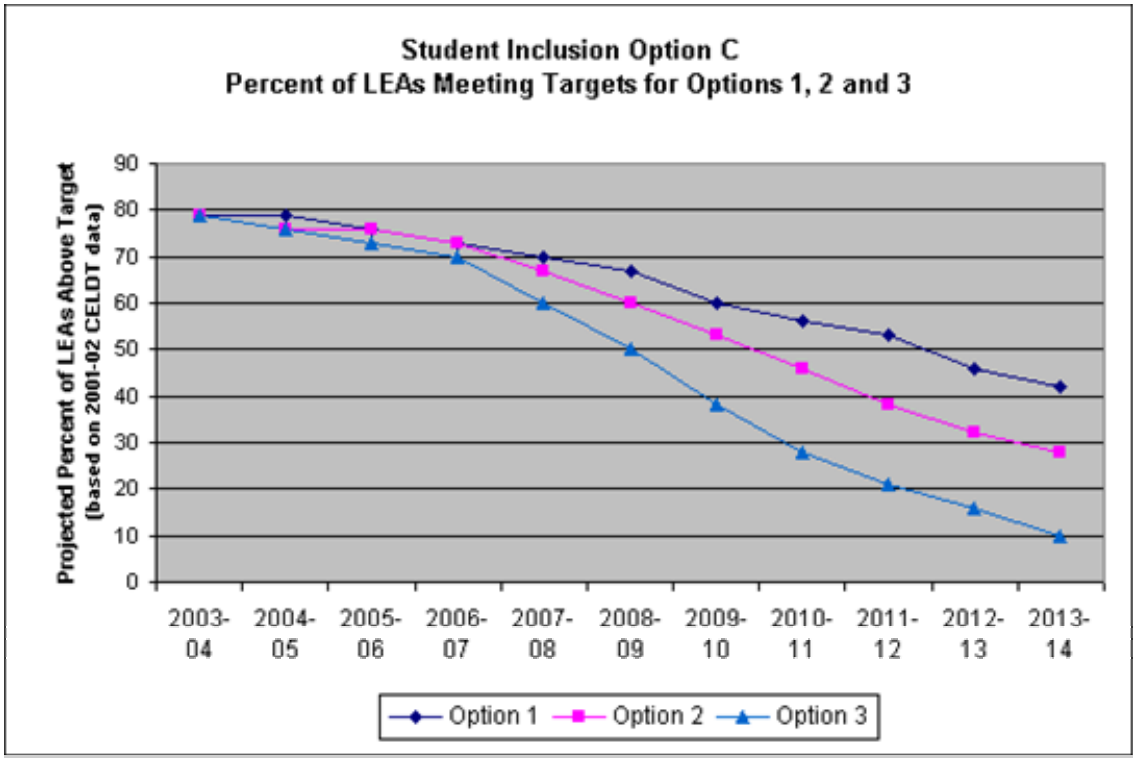




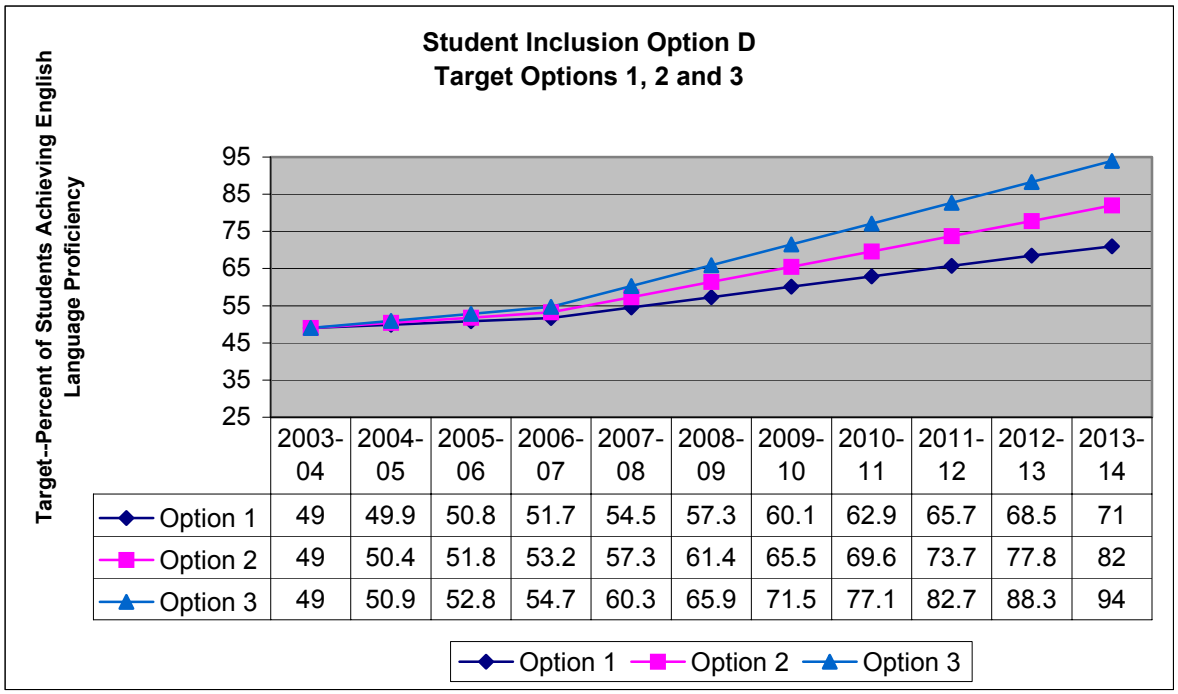
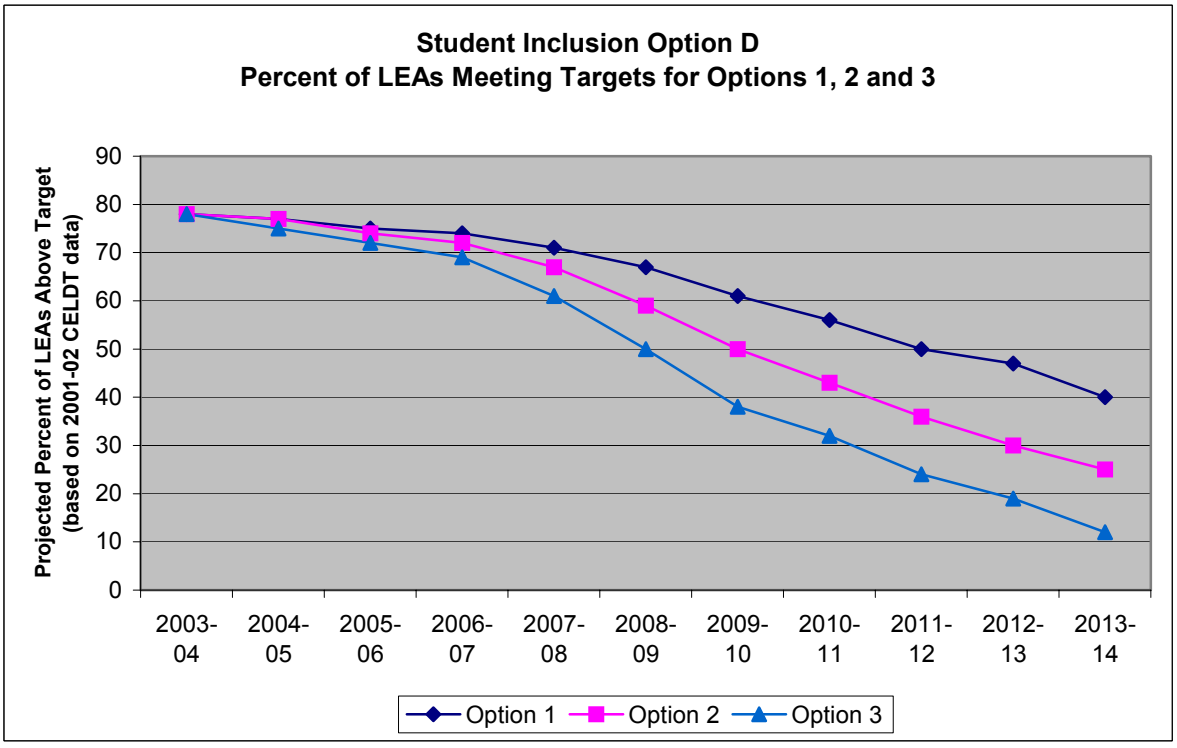
Student Inclusion Option C
Target Options and the Percent of LEAs Meeting Targets



	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14
Option 1	30	30.5	31	31.5	32.9	34.3	35.7	37.1	38.5	39.9	41
Option 2	30	30.7	31.4	32.1	34.1	36.1	38.1	40.1	42.1	44.1	46
Option 3	30	31	32	33	35.9	38.8	41.7	44.6	47.5	50.4	53



Student Inclusion Option D
Target Options and the Percent of LEAs Meeting Targets



	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14
Option 1	49	49.9	50.8	51.7	54.5	57.3	60.1	62.9	65.7	68.5	71
Option 2	49	50.4	51.8	53.2	57.3	61.4	65.5	69.6	73.7	77.8	82
Option 3	49	50.9	52.8	54.7	60.3	65.9	71.5	77.1	82.7	88.3	94